

## Exhibit A

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CPM CONSULTING, LLC and  
MARTINO RIVAPLATA,

Plaintiffs,

v.

CAPSUGEL US, LLC,

Defendant.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

CIVIL ACTION NO. \_\_\_\_\_

**LIST OF DOCUMENTS ATTACHED TO NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. § 1446(a), the following documents are attached to the Notice of  
Removal filed herein:

<b><u>Exhibit</u></b>	<b><u>Document Name</u></b>	<b><u>Date Filed</u></b>
A-1	Docket Sheet – State Court	10/18/2017 (print date)
A-2	Plaintiff's Original Petition	10/2/2017
A-3	Civil Case Information Sheet	10/2/2017
A-4	Enter Demand for Jury	10/2/2017
A-5	Citation	10/4/2017

DATED: November 6, 2017

Respectfully submitted,

/s/ Talley R. Parker

Talley R. Parker

State Bar No. 24065872

talley.parker@jacksonlewis.com

JACKSON LEWIS P.C.

500 N. Akard, Suite 2500

Dallas, Texas 75201

Telephone: (214) 520-2400

Fax: (214) 520-2008

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

On November 6, 2017, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2), including by certified mail, return-receipt requested, as follows:

Steven E. Clark  
sclark@dfwlaborlaw.com  
Clark Firm PLLC  
10000 N. Central Expressway, Suite 400  
Dallas, Texas 75231  
Tel.: 214-890-4066  
Fax: 214-890-4013

/s/ Talley R. Parker

Talley R. Parker

## Exhibit A-1

**DOCKET SHEET****CASE No. DC-17-13492**





CPM Consulting, LLC et al  
vs.  
Capsugel US, LLC

§  
§  
§  
§

Location: **95th District Court**  
Judicial Officer: **MOLBERG, KEN**  
Filed on: **10/02/2017**

**CASE INFORMATION**Case Type: **EMPLOYMENT****PARTY INFORMATION**

<b>PLAINTIFF</b>	<b>CPM Consulting, LLC</b>	<i>Lead Attorneys</i> <b>CLARK, STEVEN EUGENE</b> <i>Retained</i> 214-890-4066(W)
	<b>Rivaplata, Martino</b>	<b>CLARK, STEVEN EUGENE</b> <i>Retained</i> 214-890-4066(W)
<b>DEFENDANT</b>	<b>Capsugel US, LLC</b>	

DATE	EVENTS & ORDERS OF THE COURT	INDEX
10/02/2017	NEW CASE FILED (OCA) - CIVIL	
10/02/2017	 ORIGINAL PETITION	
10/02/2017	 ISSUE CITATION 9214 8901 0661 5400 0113 2458 13	
10/02/2017	 CASE FILING COVER SHEET	
10/02/2017	 JURY DEMAND Party: PLAINTIFF CPM Consulting, LLC	
10/04/2017	<b>CITATION</b> Capsugel US, LLC Unserved CERT MAIL / BH	
10/04/2017	NOTE - ADMINISTRATOR <i>Set for initial dismissal (service/default): November 30, 2017. Notice faxed to counsel. .</i>	
11/30/2017	<b>DISMISSAL FOR WANT OF PROSECUTION (9:00 AM)</b> (Judicial Officer: MOLBERG, KEN)	

DATE	FINANCIAL INFORMATION		
	<b>PLAINTIFF Rivaplata, Martino</b>		
	Total Charges		423.00
	Total Payments and Credits		423.00
	<b>Balance Due as of 10/18/2017</b>		<b>0.00</b>
10/02/2017	Charge	PLAINTIFF Rivaplata, Martino	423.00
10/02/2017	CREDIT CARD - Receipt # 64450-2017-DCLK TEXFILE (DC)	PLAINTIFF Rivaplata, Martino	(423.00)

RECEIVED  
OCT 23 2017

BY: \_\_\_\_\_

STATE OF TEXAS }  
COUNTY OF DALLAS }

I, FELICIA PITRE, Clerk of the District of Dallas County, Texas, do hereby certify that I have compared this instrument to be a true and correct copy of the original as appears on record in my office.

GIVEN UNDER MY HAND AND SEAL of said Court, at office in Dallas, Texas, this 18<sup>th</sup> day of Oct, A.D., 2017

FELICIA PITRE, DISTRICT CLERK  
DALLAS COUNTY, TEXAS

By Becky Johns Deputy

## Exhibit A-2

1 CT-CERT-MAIL

Freeney Anita

CAUSE NO. DC-17-13492

CPM CONSULTING, LLC and	§	IN THE DISTRICT COURT
MARTINO RIVAPLATA,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	D-95TH
	§	<u>          </u> JUDICIAL DISTRICT
	§	
CAPSUGEL US, LLC,	§	
<i>Defendant.</i>	§	DALLAS COUNTY, TEXAS

**PLAINTIFFS' ORIGINAL PETITION**

Plaintiffs CPM Consulting, LLC ("CPM") and Martino Rivaplata ("Rivaplata," collectively with CPM, "Plaintiffs") file this Original Petition against Capsugel US, LLC ("Capsugel") seeking recovery for tortious interference with a contract formed in the state of Texas and violations of the New Jersey Law Against Discrimination, N.J.S.A. 10:5-12. In support of these claims, Plaintiffs respectfully show the Court the following:

**I. INTRODUCTION**

Plaintiffs intend that a "Level 2" Discovery Control Plan govern this action in accordance with Texas Rule of Civil Procedure 190.3.

Pursuant to Texas Rule of Civil Procedure 47, Plaintiffs seek monetary relief over \$100,000.00 including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorneys' fees.

**II. THE PARTIES**

1. Plaintiff CPM is a limited liability company, duly formed and existing under the laws of the State of Florida, with a principal place of business in Texas.
2. Plaintiff Rivaplata is the sole member of CPM and a resident of the State of Texas.
3. Defendant Capsugel is a Delaware corporation having a principal place of business in New Jersey. Capsugel may be served with process by and through its registered agent Corporation



Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7<sup>th</sup> Street, Suite 620, Austin, Texas 78701.

### III. JURISDICTION AND VENUE

4. Subject-matter jurisdiction is proper in this Court because the amount in controversy is within the Court's jurisdictional threshold.

5. Defendant Capsugel is a multinational biopharmaceutical company that manufactures and sells products throughout the world, including the state of Texas. Capsugel is subject to general personal jurisdiction in the State of Texas because its activities in this state are of a continuous and systematic nature. Capsugel has engaged in business in the State of Texas and has sufficient minimum contacts with Texas as to justify the Court's jurisdiction over it. Furthermore, such jurisdiction over Capsugel does not offend the notions of fair play and substantial justice.

6. In accordance with Section 15.001, *et seq.* of the Texas Civil Practice & Remedies Code, venue is proper in this Court because the events or omissions giving rise to Plaintiffs' cause of action occurred in whole or in part in Dallas County, Texas.

### IV. THE FACTS

7. Rivaplata, by and through his company CPM, executed a Subcontract Services Agreement (Agreement) with Robert Half Technology on or about April 3, 2017 to provide Capsugel with a SAP HANA Data Modeler (the "Project").

8. Rivaplata was informed that the project would last 6 months +, which in the industry means a minimum of one year, which was reflected in the Work Schedule attached to the Agreement. In reliance on the Agreement, Rivaplata temporarily relocated to New Jersey and leased an apartment for one year in order to perform the work on the project for Capsugel. Rivaplata received nothing but positive feedback on his work product from those at Capsugel while at the project.

9. Rivaplata is a citizen of the United States of America who resides in the State of Texas. CPM has its principal place of business located in Dallas, Dallas County, Texas. Rivaplata is the owner and sole member of CPM.

10. Rivaplata's work for Capsugel was managed by Capsugel employee Muralidhar Nuggehalli. Upon information and belief, Nuggehalli is an Indian national.

11. Without explanation, on June 14, 2017, Rivaplata was advised by Nuggehalli that his services would be terminated effective June 30, 2017—three months before the 6-month+ Project completion date. Rivaplata was later instructed to transition the project to three Capsugel employees believed to be from India: Venugopal Nair, Muppaneni Karunankar, and Yokesch Sivakumar.

12. Capsugel unlawfully discriminated in terminating Rivaplata and CPM from the Project on the basis of his nationality (United States) in favor of three Indian nationals in order to outsource the work and achieve cheaper labor costs.

13. The Capsugel IT department consists almost entirely of Indian Nationals with only a small percentage of American IT workers.

14. Based on the foregoing, Plaintiffs bring the following claims for violations of the New Jersey Law Against Discrimination and tortious interference with CPM's contract with Robert Half.

## **V. CLAIMS AGAINST CAPSUGEL**

### **COUNT ONE: TORTIOUS INTERFERENCE WITH CONTRACT**

15. Plaintiffs hereby incorporate and re-allege the matters set forth in the preceding paragraphs as if set forth at length.

16. CPM and Robert Half Technology executed a Subcontract Services Agreement in the State of Texas for the purpose of having CPM and Rivaplata perform IT services for Capsugel. In reliance on the Agreement, Plaintiff temporarily relocated from his workplace in Texas to the project site in New Jersey in order to provide services pursuant to the Agreement, and leased an apartment for a period of one year based on the 6 months+ project length.

17. Capsugel's decision to terminate CPM and Rivaplata from the Project was a willful and intentional act of interference with the Subcontract Services Agreement that was the proximate cause of Plaintiffs losing a minimum of \$84,480.00 in income for the last three months of the Project, plus rental obligations on the apartment lease for one year, for which he sues to recover of and from Capsugel.

#### **COUNT TWO: VIOLATION OF NEW JERSEY LAW AGAINST DISCRIMINATION**

18. Plaintiffs hereby incorporate and re-allege the matters set forth in the preceding paragraphs as if set forth at length.

19. This court has general personal jurisdiction over Capsugel. Rivaplata as the owner of CPM brings this claim for violations of the New Jersey Law Against Discrimination Act, N.J. Stat. Ann. § 10.5-5, *et seq.*, which occurred while he was a Texas resident temporarily working for Capsugel in New Jersey. Capsugel's actions resulted in the termination of CPM's subcontractor agreement with Robert Half -- a contract negotiated and executed in the State of Texas, which caused loss of income damage to CPM and Rivaplata in the State of Texas.

20. Rivaplata belongs to a protected class because of his nationality (United States citizen).

21. Rivaplata was qualified for the consulting work he was hired to perform for Capsugel. He performed the work adequately and received nothing but praise on his work product while working at the project.

22. Capsugel intentionally terminated Plaintiff from the Project three months before its minimum scheduled completion date, despite excellent work performance, so that it could transition the Project to three Capsugel employees from India, who had cheaper labor rates than Plaintiff. The termination was due to Rivaplata's nationality (United States), and Capsugel's intentional decision to outsource his work to foreign nationals. As reported by 60 Minutes, this is a common practice among IT companies.

23. The foregoing allegations are sufficient to state a prima facie claim of discrimination under the New Jersey Law Against Discrimination. In addition, upon information and belief, employees of Capsugel, including those of Indian ancestry, have a pattern or practice of discriminating against U.S. citizens employed to do IT work at Capsugel projects in the United States by outsourcing their jobs to employees in India, or persons of Indian descent.

24. Plaintiff Rivaplata has suffered and sustained substantial injury by reason of Capsugel's unlawful discrimination for which he seeks appropriate judicial relief including, but not limited to, the recovery of actual and special monetary damages (including compensatory and consequential damages), back pay, front pay, rental expenses, interest, attorneys' fees in and court costs in a sum within the jurisdictional limits of the Court.

#### **VI. ATTORNEYS' FEES AND COSTS OF COURT**

25. Plaintiffs hereby incorporate and reallege the matters set forth in the preceding paragraphs as if set forth at length.

26. Plaintiffs have retained the undersigned attorneys to represent it in this action and have agreed to pay them reasonable and necessary attorneys' fees.

27. Plaintiffs hereby seek an award of their reasonable and necessary attorneys' fees incurred in the trial court and any and all appeals therefrom.

#### **VII. JURY DEMAND**

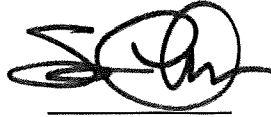
28. Plaintiffs respectfully request a trial by jury on their claims against Capsugel.

#### **VIII. PRAYER**

Plaintiffs respectfully requests that upon trial this Court enter a judgment in favor of Plaintiffs against Capsugel providing for the following relief:

1. An award of their actual and special damages as pleaded herein, including front pay, back pay, reinstatement, and all compensatory, exemplary, consequential, and economic damages within the jurisdictional limits of the Court;
2. Plaintiffs' reasonable attorney's fees;
3. Plaintiffs' costs of Court;
4. Pre-judgment and post-judgment interest at the highest rate(s) allowed by law;
5. Such other and further relief, at law or in equity, to which Plaintiffs may be entitled.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'SE Clark', written over a horizontal line.

Steven E. Clark  
State Bar No. 04294800

CLARK FIRM PLLC  
10000 N. Central Expressway, Suite 400  
Dallas, Texas 75231  
Tel.: (214) 890-4066  
Fax: (214) 890-4013  
Email: [sclark@dfwlaborlaw.com](mailto:sclark@dfwlaborlaw.com)

ATTORNEYS FOR PLAINTIFF  
MARTINO RIVAPLATA and  
CPM CONSULTING, LLC

RECEIVED  
OCT 23 2017

BY:-----

STATE OF TEXAS }  
COUNTY OF DALLAS }

I, FELICIA PITRE, Clerk of the District of Dallas County, Texas, do hereby certify that I have compared this Instrument to be a true and correct copy of the original as appears on record in my office.

GIVEN UNDER MY HAND AND SEAL of said Court, at office  
In Dallas, Texas, this 18<sup>th</sup> day of Oct., A.D., 2017

FELICIA PITRE, DISTRICT CLERK  
DALLAS COUNTY TEXAS

By Benny John Deputy

## Exhibit A-3



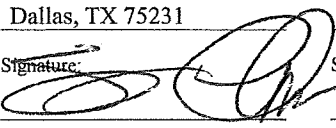
## CIVIL CASE INFORMATION SHEET

CAUSE NUMBER (FOR CLERK USE ONLY): \_\_\_\_\_ COURT (FOR CLERK USE ONLY): \_\_\_\_\_

STYLED CPM CONSULTING, LLC and MARTINO RIVAPLATA v. CAPSUGEL US, LLC

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

<b>1. Contact information for person completing case information sheet:</b>  Name: <u>Steve Clark</u> Email: <u>sclark@dfwlaborlaw.com</u>  Address: <u>10000 N. Central Expy. #400</u> Telephone: <u>(214) 890-4066</u>  City/State/Zip: <u>Dallas, TX 75231</u> Fax: <u>(214) 853-5458</u>  Signature:  State Bar No: <u>04294800</u>		<b>Names of parties in case:</b>  Plaintiff(s)/Petitioner(s): <u>CPM Consulting, LLC</u>  <u>Martino Rivaplata</u>  Defendant(s)/Respondent(s): <u>CAPSUGEL US, LLC</u>  [Attach additional page as necessary to list all parties]		<b>Person or entity completing sheet is:</b> <input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____  Additional Parties in Child Support Case:  Custodial Parent: _____  Non-Custodial Parent: _____  Presumed Father: _____	
<b>2. Indicate case type, or identify the most important issue in the case (select only 1):</b>					
Civil			Family Law		
<b>Contract</b> <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: _____  <b>Foreclosure</b> <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: _____	<b>Injury or Damage</b> <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <b>Malpractice</b> <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: _____  <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <b>Product Liability</b> <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: _____  <input type="checkbox"/> Other Injury or Damage: _____	<b>Real Property</b> <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____  <b>Related to Criminal Matters</b> <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____	<b>Marriage Relationship</b> <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <b>Divorce</b> <input type="checkbox"/> With Children <input type="checkbox"/> No Children  <b>Other Family Law</b> <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____	<b>Post-judgment Actions (non-Title IV-D)</b> <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other  <b>Title IV-D</b> <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order  <b>Parent-Child Relationship</b> <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____	
<b>Employment</b> <input checked="" type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____		<b>Other Civil</b> <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input checked="" type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____			
<b>Tax</b> <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax		<b>Probate &amp; Mental Health</b> <b>Probate/Wills/Intestate Administration</b> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____			
<b>3. Indicate procedure or remedy, if applicable (may select more than 1):</b>					
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action		<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment		<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover	
<b>4. Indicate damages sought (do not select if it is a family law case):</b> <input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input checked="" type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input type="checkbox"/> Over \$1,000,000					

RECEIVED  
OCT 23 2017

BY:\_\_\_\_\_

STATE OF TEXAS }  
COUNTY OF DALLAS }

I, FELICIA PITRE, Clerk of the District of Dallas County, Texas, do hereby certify that I have compared this Instrument to be a true and correct copy of the original as appears on record in my office.

GIVEN UNDER MY HAND AND SEAL of said Court, at office in Dallas, Texas, this 18th day of Oct, A.D., 2017

FELICIA PITRE, DISTRICT CLERK  
DALLAS COUNTY, TEXAS

By Benny Johns Deputy

Exhibit A-4



FELICIA PITRE  
DALLAS COUNTY DISTRICT CLERK

NINA MOUNTIQUE  
CHIEF DEPUTY

**CAUSE NO. DC-17-13492**

CPM Consulting, LLC et al

vs.

Capsugel US, LLC

95th District Court

**ENTER DEMAND FOR JURY**

JURY FEE PAID BY: P

FEE PAID: \$40.00

RECEIVED  
OCT 23 2017  
BY: \_\_\_\_\_

STATE OF TEXAS }  
COUNTY OF DALLAS }

I, FELICIA PITRE, Clerk of the District of Dallas County, Texas, do hereby certify that I have compared this Instrument to be a true and correct copy of the original as appears on record in my office.

GIVEN UNDER MY HAND AND SEAL of said Court, at office in Dallas, Texas, this 18<sup>th</sup> day of Oct, A.D., 2017

FELICIA PITRE, DISTRICT CLERK  
DALLAS COUNTY TEXAS

By Beauy Johns Deputy

## Exhibit A-5

**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

To:

**CAPSUGEL US, LLC  
REGISTERED AGENT CORPORATION SERVICE COMPANY DBA CSC-LAWYERS  
INCORPORATING SERVICE COMPANY  
211 E 7TH STREET SUITE 620  
AUSTIN TX 78701**

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. Your answer should be addressed to the clerk of the **95th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **CPM CONSULTING, LLC AND MARTINO RIVAPLATA**

Filed in said Court **2nd day of October, 2017** against

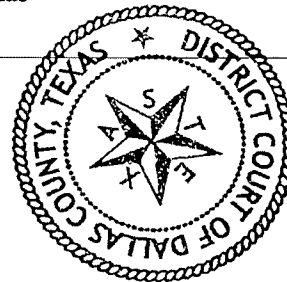
**CAPSUGEL US, LLC**

For Suit, said suit being numbered **DC-17-13492**, the nature of which demand is as follows:  
Suit on **EMPLOYMENT** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.  
Given under my hand and the Seal of said Court at office this 4th day of October, 2017.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Belinda Hernandez*, Deputy  
BELINDA HERNANDEZ



**CERT MAIL**

**CITATION**

**DC-17-13492**

**CPM CONSULTING, LLC et al  
vs.  
CAPSUGEL US, LLC**

**ISSUED THIS  
4th day of October, 2017**

**FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas**

By: BELINDA HERNANDEZ, Deputy

**Attorney for Plaintiff  
STEVEN EUGENE CLARK  
10000 N CENTRAL EXPWY  
SUITE 400  
DALLAS TX 75231  
214-890-4066**

**DALLAS COUNTY CONSTABLE  
FEES PAID  
FEES NOT PAID**

## OFFICER'S RETURN

Case No. : DC-17-13492

Court No. 95th District Court

Style: CPM CONSULTING, LLC et al

vs.

CAPSUGEL US, LLC

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_\_ .M. Executed at \_\_\_\_\_,  
within the County of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ .M. on the \_\_\_\_\_ day of \_\_\_\_\_,  
20\_\_\_\_\_, by delivering to the within named

each, in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by  
me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

For serving Citation	\$ _____	_____
For mileage	\$ _____	of _____ County, _____
For Notary	\$ _____	By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_,  
to certify which witness my hand and seal of office.

Notary Public \_\_\_\_\_ County \_\_\_\_\_



RECEIVED  
OCT 23 2017  
BY: \_\_\_\_\_

STATE OF TEXAS }  
COUNTY OF DALLAS }

I, FELICIA PITRE, Clerk of the District of Dallas County, Texas, do hereby certify that I have compared this instrument to be a true and correct copy of the original as appears on record in my office.

GIVEN UNDER MY HAND AND SEAL of said Court, at office  
in Dallas, Texas, this 18th day of Oct., A.D., 2017

FELICIA PITRE, DISTRICT CLERK  
DALLAS COUNTY, TEXAS

By Benny Johns Deputy